

Civil Action No. 1:22-cv-00424-RP

1. I make this declaration based on personal knowledge. If called upon to testify, I could and would testify competently to the following facts.
2. I attempted to check out *My Butt Is So Noisy!*, *I Broke My Butt*, *I Need a New Butt!*, *Larry the Farting Leprechaun*, *Gary the Goose and His Gas on the Loose*, *Freddie the Farting Snowman* and, *Harvey the Heart Has Too Many Farts* from the Llano Library on April 22, 2022. I was unable to check these books out because I was told by a librarian that the books had been removed and were no longer available to be checked out in the Llano County Library System.
3. When I attempted to check these books out, I was not informed by anyone at the Llano County Library System that these books could be obtained through an inter-library loan.
4. In or around May 2022, I became aware that the Library System had replaced OverDrive with Bibliotheca/cloudLibrary. I tried to use Bibliotheca/cloudLibrary but found it difficult to use and the librarians I asked for help were not able to assist me. Moreover, I prefer

physical books to digital books. An additional feature of Bibliotheca/cloudLibrary that I dislike is that you cannot place a hold on a book unless your home library has it.

5. I have never heard of “in-house checkout” at the Llano County Library System. The idea of having to specifically request books that Defendants do not see fit to put on the shelves from this system is humiliating, especially given all the community talk about the books in the “in-house checkout” system. I feel that going to a physical library location and asking for books from the “in house checkout” system would make a spectacle of me.

6. I have been told by Amber Milum on more than one occasion that the last new physical book order was in October 2021. Additionally, my understanding of Ms. Milum’s comments is that even that final order in October 2021 was not catalogued or put on the library shelves.

7. I am a former member of the County’s Library Board and was fired from this position when the Commissioners Court decided to appoint new board members earlier this year. Commissioner Jerry Don Moss’s refusal to speak with me prior to this lawsuit being filed about his reasons for refusing to reappoint me was unsettling.

8. Furthermore, I now understand that Judge Cunningham has indicated that the reason the previous Library Board was dismantled was because of low frequency of meetings. I find it offensive that the Commissioner’s Court would use the fact that the Library Board did not meet as frequently during the COVID-19 pandemic for safety purposes as an excuse to dismantle the Library Board. When I was a member, Llano Library Board meetings were held quarterly. Based on the information that has been provided in this lawsuit, it appears the new Board meets much more frequently and is much more involved in the day-to-day tasks of the library, including financial, collection, and removal decisions. Furthermore, even though Defendants are

now calling it the "Library Advisory Board," it was always referred to as The Llano County Library Board, and the January 5, 2020 bylaws reflect that.

9. Defendants' conduct has created an atmosphere of fear and distrust throughout the libraries that goes well beyond the removal of books that I am aware have been pulled from shelves. Despite having made public statements reflecting that these books were removed due to their content, Defendants are now saying they were removed as part of a routine weed. So, why haven't replacement copies been put on the shelves? As explained above, my understanding is that no new books have been put on shelves since October 2021.

10. Now, when I browse the library shelves, I am not sure whether books are missing for legitimate reasons, or because Defendants disagree with their content. This has made me feel even less at home in Llano's libraries, which had previously been a source of comfort, ease and familiarity for me.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: July 28, 2022

By:

DocuSigned by:
Jeanne Puryear
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Jeanne Puryear